



**UNITES STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 8**

1595 Wynkoop Street  
DENVER, CO 80202-1129  
Phone 800-227-8917  
<http://www.epa.gov/region08>

SEP 13 2010

Ref: EPR-N

Jeremy Casterson  
Planning Coordinator  
BLM Little Snake Field Office  
455 Emerson Street  
Craig, CO 81625

Re: Little Snake Final EIS and Resource  
Management Plan, CEQ # 20010309

Dear Mr. Casterson:

The U.S. Environmental Protection Agency, Region 8 (EPA) has reviewed the Bureau of Land Management's (BLM) Final Environmental Impact Statement (EIS) and Resource Management Plan (RMP) for the Little Snake River Field Office (LSRFO). Our comments are provided to you pursuant to our authority under Section 102(2)(C) of the National Environmental Policy Act (NEPA), 42 U.S.C. Section 4332(2)(C), and Section 309 of the Clean Air Act, 42 U.S.C. Section 7609.

BLM issued a Draft EIS in January 2007 and, in response to comments received on the Draft EIS, a supplemental air quality analysis was prepared in September 2008. EPA provided comments on the Draft EIS, except for the air quality section, in a letter dated August 16, 2007. Those comments on the Draft EIS addressed the range of alternatives, protection for sage grouse and their habitat, water quality, the Vermillion Basin oil and gas leasing plan, greenhouse gas emissions, irreversible and irretrievable commitment of resources, removal of area of critical environmental concern (ACEC) status, and transportation and travel management. EPA provided air quality comments based on the information presented in both the Draft EIS and the supplemental air quality analysis in a letter dated November 26, 2008. Those comments were focused on the presentation of the results of the air quality analysis and future steps.

EPA would like to reiterate its appreciation for completion of the supplemental air quality analysis. We appreciate BLM's use of conservative measures such as the number of oil and gas leases expected in its development. The supplemental air quality analysis added substantial value to the EIS through assessment and disclosure of potential impacts. We also commend BLM's revision to the RMP to manage Vermillion Basin for its wilderness characteristics.

The Final EIS does not fully disclose why a geographically-phased approach for oil and gas development was eliminated from full analysis. We consider this type of approach to oil and gas development to be particularly well suited for adaptive management and, consequently, the

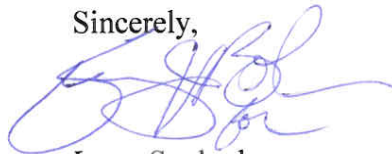
minimization of impacts. However, we are pleased to see that some of our concerns were addressed with changes to the Final EIS and RMP. BLM collaborated with the Colorado Division of Wildlife to evaluate medium and high priority sagebrush habitat and revised the RMP to include stipulations for new leases in these areas. The stipulations increase protection of high and medium priority sagebrush habitat with 1% and 5% respective caps on surface area disturbance. In addition to the disturbance caps, EPA supports BLM's considerations regarding minimization of habitat fragmentation within the project areas and encourages monitoring be incorporated into either the RMP or the Record of Decision (ROD) to assess the effectiveness of these mitigation measures.

The Final EIS and RMP do not provide mitigation for impacts to visibility. The results of the supplemental air quality impact analysis predict additional days of visibility impairment within the Mt. Zirkel Wilderness Area (a Class I area under the Clean Air Act) and Dinosaur National Monument (a Class II area). We continue to recommend that a mitigation strategy be developed for the impacts associated with visibility and further recommend BLM attach supplemental lease stipulations to implement more effective mitigation measures for each proposed plan of development.

The Final EIS does not fully evaluate cumulative impacts related to development in the LSRFO and surrounding areas specifically as related to disclosure of impacts to air quality. EPA recommends that BLM incorporate the effects of development in the LSRFO, including the impacts to visibility, into the cumulative air quality effects analyses for the White River RMP amendment/EIS and the Colorado River Valley RMP/EIS.

We appreciate the opportunity to review and comment on this Final EIS. If we may provide further explanation of our comments, please contact me at 303-312-6004, or Maggie Pierce at 303-312-6550.

Sincerely,



Larry Svoboda  
Director, NEPA Compliance and Review Program  
Ecosystems Protection and Remediation